

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**ELMAGIN CAPITAL LLC,**

**Plaintiff,**

**v.**

**CHAO CHEN;  
KARL PETTY;  
ENTERGRID LLC;  
ENTERGRID FUND I LLC**

**Defendants.**

:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:

**CIVIL ACTION NO.:  
2:20-cv-02576-TJS**

**PLAINTIFF ELMAGIN CAPITAL, LLC’S  
MOTION FOR CIVIL CONTEMPT, ENFORCEMENT OF, AND SANCTIONS FOR,  
DEFENDANTS’ PATTERN OF VIOLATIONS OF PROTECTIVE ORDER**

Plaintiff, Elmagin Capital, LLC (“Plaintiff” or “Elmagin”), through its undersigned counsel, moves the Court for an Order of contempt and for the imposition of sanctions against Defendants and Defendants’ counsel of record for their pattern of violations of the Stipulated Protective Order in this litigation (Doc. 013-1; Approved at Doc. 015) by the disclosure of Protected Material of Plaintiff, including materials revealing details of the trade secrets asserted in this litigation, in public filings, to Defendants, and to third party service providers of Defendants beyond those permitted by the Stipulated Protective Order, without challenge by Defendants to the designation of such material, and based upon the sole discretion of Defendants’ counsel as to the permissibility of such disclosures.

The basis for this Motion is more fully set forth in the accompanying Memorandum of Law. Accordingly, Plaintiff respectfully requests entry of the proposed Order submitted with this Motion.

Respectfully submitted,

**CAESAR RIVISE, PC**

By: /s/ Douglas Panzer  
Douglas Panzer (PA Bar ID 203354)  
Manny Pokotilow (PA Bar ID 13310)  
Allison White (PA Bar ID 329108)  
Caesar Rivise, P.C.  
1635 Market Street, 12<sup>th</sup> Floor  
Philadelphia, PA 19103  
Tel: (215) 567-2010  
[dpanzer@crbcp.com](mailto:dpanzer@crbcp.com)  
[mpokotilow@crbcp.com](mailto:mpokotilow@crbcp.com)  
[awhite@crbcp.com](mailto:awhite@crbcp.com)  
*Attorneys for Plaintiff,*  
*Elmagin Capital, LLC*  
  
Dated: November 29, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that on November 29, 2021, a copy of the foregoing Motion For Civil Contempt, Enforcement of, and Sanctions for, Defendants' Pattern of Violations of Protective Order, including exhibits thereto, and Proposed Order were served on the below listed Attorneys for Defendants via the Court's ECF system:

Nicole D. Galli  
Charles P. Goodwin

ND Galli Law LLC  
One Liberty Place  
1650 Market Street  
Suite 3600, #00250  
Philadelphia, PA 19103  
[ndgalli@ndgallilaw.com](mailto:ndgalli@ndgallilaw.com)  
[cgoodwin@ndgallilaw.com](mailto:cgoodwin@ndgallilaw.com)

*Attorneys for Defendants*

/s/ Douglas Panzer  
Douglas Panzer (PA Bar ID: 203354)